Date: May 28, 1991

To: All Wisconsin Home Health Agencies HHA 8

From: Larry Tainter, Director

Bureau of Quality Assurance

Kevin Piper, Director

Bureau of Health Care Financing

Subject: Wound Care

A recent issue brought to the attention of the Bureau concerns the performance of wound care by unlicensed caregivers.

We define "wound" as a break in the continuity of the skin. Wound care can be delegated to the unlicensed caregiver, provided the following conditions are met:

- 1. There is an assessment by the RN to determine the appropriateness of the delegated act to the unlicensed caregiver under the RN's professional license.
- 2. There is written delegation and assignment in place which addresses the patient-specific procedures to be followed relative to wound care.
- 3. There is documentation to reflect that appropriate training has been provided and that competency has been demonstrated by the unlicensed caregiver. Training shall include, but is not limited to:
  - a) aseptic technique;
  - b) universal precautions
  - c) other patient-specific procedures as ordered by the physician;
  - d) documentation by the unlicensed caregiver relative to the procedure and observations made;
  - e) reporting of changes in wound condition that may require skilled nursing intervention.
- 4. Patients must be informed, prior to the delivery of service, that wound care will be provided by an unlicensed caregiver.
- 5. The medical plan of care shall reflect the provision of wound care by the unlicensed caregiver.
- 6. The registered nurse shall supervise the performance of this skilled nursing act, which has been delegated under his/her license at least every 14 days and as often as patient needs dictate, and there is immediate and accessible supervisory support available to the unlicensed caregiver providing wound care.

- 7. Agency administration shall ensure that policies are in place reflecting procedures and protocols for wound care by unlicensed caregivers under the delegation of the registered nurse.
- 8. The Bureau of Health Care Financing will require documentation relative to the specific wound care training provided by the home health aide along with the name of the delegating nurse, on the prior authorization request form for WMAP recipients.

We hope you find this information helpful. If you have any questions, please call Mary Krill at (608) 266-9433.

LT:KP:bc 6544

cc: -BQC Staff

-Office of Legal Counsel

-George F. MacKenzie, DOH Admin.

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-HCFA, Region V

-Illinois State Agency

-Ohio State Agency

-Michigan State Agency

-Indiana State Agency

-Minnesota State Agency

-WI Coalition for Advocacy

-Service Employees International Union

-WI Counties Assn.

-WI Medical Records Assn. Cons. Committee

-WI Assoc. of Homes and Services for Aging

-Comm. on Aging, Ext. Care Fac./HH (SMS)

-WI Assn. Nursing Homes

-WI Assn. of Hosp. SW & Discharge Planners

-WI Homecare Organization

-Bur. Long Term Support, DCS